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510(k) Summary

DRAFT 9-27-2010

JUN 1 4 2011

Proprietary Name:

HydroFixTM Surgical Sheet

Common Name:

Surgical Sheet

Classification Name:

21 CFR § 878.3300, Surgical Mesh

Device Class:

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Product Code:

FTL

Classification Panel:

General & Plastic Surgery

Establishment Registration: 3006731846

Contact Person:

Sally Thorsen

MiMedx Group, Inc.

811 Livingston Court SE, Suite B

Marietta, GA 30067 sthorsen@mimedx.com

Manufacturer:

MiMedx Group, Inc.

811 Livingstone Court SE, Suite B

Marietta, GA 30067

Performance Standards:

Testing performed indicates the HydroFixTM Surgical Sheet is substantially equivalent to predicate devices.

Device Description:

The HydroFix™ Surgical Sheet is a flexible sheet of 30 Wt.% polyvinyl alcohol (PVA) material with dimensions 60 \pm 6 mm X 50 \pm 5 mm and 60 \pm 6 mm X 100 \pm 10 mm with a thickness of 1.0 ±0.2 mm. The corners of the sheet are rounded. There are no holes or perforations. There are no markings on either side of the sheet, raised (embossed) or printed. The sheet is provided sterile and hydrated in saline solution.

The HydroFixTM Surgical Sheet will be provided in other shapes and sizes as needed for particular surgical procedures.

Indications For Use:

The MiMedx HydroFixTM Surgical Sheet is indicated for the management and protection of tendon injuries in which there has been no substantial loss of tendon tissue. The surgical sheet minimizes tissue attachment to the device in case of direct contact with the tissues.

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Substantially Equivalent Device(s):

The following are substantially equivalent predicate devices.

K072190 Mast Biosurgery, Ortho-Wrap Bioresorbable Sheet K090778 Xylos Corporation, MTA Protective Sheet

The MiMedx Group $HydroFix^{TM}$ Surgical Sheet was shown to be substantially equivalent to previously cleared device and has the same indications for use, design, function and/or materials.

Brief Comparison Summary:

To demonstrate substantial equivalence of the MiMedx *HydroFix*TM *Surgical Sheet* to the predicate devices, technological characteristics and performance criterion were evaluated using *in vitro* and *in vivo* testing as indicated below:

In Vitro Testing

- Suture Pull out
- Tensile Strength
- Burst Strength
- Tear resistance

The results of these tests demonstrate that the technological characteristics and performance criteria of the MiMedx $HydroFix^{TM}$ Surgical Sheet are comparable to the predicate devices and that it can perform in a manner equivalent to devices currently on the market for the same intended use.

In Vivo Testing

To assess the performance of the MiMedx *HydroFix*TM Surgical Sheet, in vivo studies have been conducted in both sheep and rabbit models to evaluate the following attributes:

- Tissue attachment
- Ability to suture to tissue
- Ability to cut the sheet
- Ability to secure to tissue
- Ability to manage and protect tendon injuries

The results of these studies show the MiMedx *HydroFix*TM Surgical Sheet are comparable to predicate devices and that it can perform in a manner equivalent to devices currently on the market for the same intended use.

Conclusion:

The sponsor believes that the data and information presented in this 510(k) application, including in vitro and in vivo testing, and numerous device similarities support a determination of substantial equivalence, and therefore market clearance of the MiMedx *HydroFix*TM *Surgical Sheet* through this 510(k).





Food and Drug Administration 10903 New Hampshire Avenue Document Control Room -WO66-G609 Silver Spring, MD 20993-0002

MiMedx Group % Mr. William Jackson VP, Regulatory Affairs and Quality Assurance 811 Livingston Court SE, Suite B Marietta, GA 30067

JUN 1 4 2011

Re: K100313

Trade/Device Name: MiMedx HydroFix Surgical Sheet

Regulation Number: 21 CFR 878.3300

Regulation Name: Surgical mesh

Regulatory Class: II Product Code: FTL Dated: June 2, 2011 Received: June 2, 2011

Dear Mr. Jackson:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21)

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CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please go to http://www.fda.gov/AboutFDA/CentersOffices/CDRH/CDRHOffices/ucm115809.htm for the Center for Devices and Radiological Health's (CDRH's) Office of Compliance. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21) CFR Part 803), please go to

http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm.

Sincerely yours,

Mark N. Melkerson Denkelm Win.

Director

Division of Division of Surgical, Orthopedic

and Restorative Devices Office of Device Evaluation

Center for Devices and Radiological Health

Enclosure

Indications for Use

510(k) Number (if known):K100313
Device Name: MiMedx HydroFixTM Surgical Sheet
The MiMedx HydroFix TM Surgical Sheet is indicated for the management and protection of tendon injuries in which there has been no substantial loss of tendon tissue. The surgical sheet minimizes tissue attachment to the device in case of direct contact with the tissues.
Prescription Use AND/OR Over-The-Counter Use (21 CFR 801 Subpart C)
(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE OF NEEDED)
Concurrence of CDRH, Office of Device Evaluation (ODE)

Division of Surgical, Orthopedic,

and Restorative Devices